

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court
Southern District of Texas

APR 10 2015

Clerk of Court

United States of America)
v.)
Christian Omar Amezcuita-Munoz)
DOB: 1984)
(MEXICO))

Case No. M-15-0552-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 10, 2015 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section	Offense Description
21 USC § 841(a)(1) 18 USC § 2	Possession with intent to distribute approximately 16 kilograms of cocaine, a schedule II controlled substance,

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Approved:

Robert Wille A USA
4/10/2015



Complainant's signature

Rafael Vences, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/10/2015

4:30 pm



Judge's signature

City and state: McAllen, Texas

Peter E. Ormsby, United States Magistrate Judge

Printed name and title

Attachment "A"

I, Rafael Vences, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I have been so employed since March 2012. The facts in this affidavit come from my personal observations, training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

2. On April 09, 2015, a reliable confidential human source (hereinafter referred to as "CHS") informed FBI agents that "CHRISTIAN" (later identified as Christian Omar AMEZQUITA-Munoz) requested the CHS to transport a cooler containing narcotics from the Rio Grande Valley to Chicago, Illinois. CHS advised the agents that AMEZQUITA-Munoz drove a white Ford Ranger with a toolbox in the bed of the truck.

3. On April 10, 2015, the CHS advised FBI Agents that AMEZQUITA-Munoz would deliver a cooler containing narcotics to the CHS at the O'Reilly auto parts store located in Palmview, Texas at 10:00am. FBI Agents identified the address of the auto parts store as 804 East Veterans Boulevard Palmview, Texas (hereinafter referred to as TARGET LOCATION). The CHS drove a Ford pickup truck to the TARGET LOCATION and waited for the delivery. Prior to driving to the TARGET LOCATION, FBI agents searched the inside and bed of the pickup truck to ensure there was not a cooler prior to departure.

4. At approximately 09:50am FBI agents setup up surveillance at the TARGET LOCATION. At approximately 10:00am, FBI agents observed AMEZQUITA-Munoz drive a white Ford Ranger to the TARGET LOCATION and park adjacent to the Ford pickup that was driven by the CHS. AMEZQUITA-Munoz and the CHS exited their respective vehicles and met

at the front of their vehicles. FBI agents observed AMEZQUITA-Munoz transfer a cooler from his white Ford Ranger to the bed of the pickup that was being driven by the CHS.

5. FBI agents observed the CHS drive away from the parking lot of the TARGET LOCATION. FBI agents followed the CHS to a nearby location and recovered the cooler from the CHS. The cooler contained perishable food items and some drinks. There were no ice or ice packs inside the cooler. FBI agents observed that the cooler was extraordinarily heavy given its size and contents. FBI agents discovered wrapped bundles concealed in the insulated walls of the cooler. The bundles contained a white powdery substance that field tested positive for the presence of cocaine. The total weight of the cocaine was approximately 16 kilograms.

6. Meanwhile, AMEZQUITA-Munoz was observed entering the auto parts store and subsequently exiting the auto parts store a short time later. AMEZQUITA-Munoz entered his white Ford Ranger and departed the TARGET LOCATION. FBI agents maintained surveillance on the vehicle.

7. On the request of the FBI, a Texas Department of Public Safety Trooper executed a traffic stop on the white Ford Ranger and identified the driver as Christian Omar AMEZQUITA-Munoz and placed him under arrest.